

EXHIBIT P

**Redacted Version of
Document Sought to be Sealed**

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

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CHASOM BROWN; MARIA NGUYEN; WILLIAM
BYATT; JEREMY DAVIS; and CHRISTOPHER
CASTILLO, individually and on behalf
of all other similarly situated,

Plaintiffs,

No. 5:20-cv-03664-LHK

-against-

GOOGLE LLC,

Defendant.

- - - - - x

Zoom video conference deposition of
RORY McCLELLAND, taken pursuant to
notice, was held remotely, commencing
February 18, 2022, 5:30 a.m. Eastern
Standard Time, before Leslie Fagin, a
Stenographic Court Reporter and Notary
Public in the State of New York.

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1 R. McClelland
2 with the theme of [REDACTED]; Sundar
3 was particularly excited about this and felt
4 it could be a very powerful component of the
5 narrative.

6 What do you understand the
7 reference to [REDACTED] mean?

8 MS. CRAWFORD: Objection, insofar
9 as you are asking the witness to
10 speculate.

11 A. I am speculating. I can't remember
12 whether this came before the [REDACTED]
13 proposal or afterwards, but at this point in
14 time, generally, there were various
15 conversations around what an [REDACTED]
16 [REDACTED] might look like, so it's basically
17 referring to something of the nature of the
18 previous document we looked at.

19 Q. So aside from the previous
20 documents that we looked at that had two
21 different proposals, what other proposals
22 were being considered by Google that would
23 fall into the category of [REDACTED]

24 MS. CRAWFORD: Objection, assumes
25 facts, foundation.

1 R. McClelland

2 A. I have no reason to doubt it, no.

3 Q. If you know, why was Mr. Pichai
4 particularly excited about [REDACTED]

5 [REDACTED]

6 MS. CRAWFORD: Same objection,
7 calls for speculation.

8 A. I don't know, I wasn't in the
9 meeting. I only got the feedback as per this
10 email.

11 Q. [REDACTED] was not
12 implemented, correct?

13 A. No, it was never implemented.

14 Q. Aside from the two proposals that
15 we discussed earlier that involved changes to
16 Incognito mode, do you recall any other ones
17 that were not implemented?

18 A. No, I think we have them all there.

19 Q. Let's look at the next exhibit.

20 This one has been marked as Exhibit 8.

21 Exhibit 8 is a document Google
22 produced with production Nos.

23 GOOG-CABR-04734899 through 902.

24 Please let me know when you have it
25 in front of you.